

OBER | KALER
A Professional Corporation

Ober, Kaler, Grimes & Shriver
Attorneys at Law

120 East Baltimore Street
Baltimore, MD 21202-1643
410-685-1120 / Fax 410-547-0699
www.ober.com

1401 H Street, NW
Washington, DC 20005-3324
202-408-8400 / FAX 202-408-0640

Matthew W. Nayden
mwnayden@ober.com
410-347-7328

Offices in
Maryland
Washington, D.C.
Virginia

April 11, 2003

Honorable J. Frederick Motz
United States District Court
for the District of Maryland
Garmatz Federal Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

Re: *In re Microsoft Corp. Antitrust Litigation, MDL 1332; Burst.com, Inc. v. Microsoft Corporation, JFM-02-CV-2952*

Dear Judge Motz:

We correspond for Nortel Networks, a non-party to the cited action or "third party" within the meaning of the Court's "Amended Stipulated Protective Order re Competitor Cases" (October 31, 2002). We respond to the March 21, 2003 letter of Bruce Wecker, Esquire for the four "competitor plaintiffs" (convenience copy attached).

Mr. Wecker's letter requests Nortel's filed objections to Microsoft's production in this action of documents previously produced by Nortel in other proceedings involving Microsoft, particularly as such documents may be subject to protective orders in those other proceedings.

Nortel is informed that Microsoft has only 5 pages produced directly by Nortel in one of the other proceedings described by Mr. Wecker's letter. Nortel has no objection to Microsoft's production of those documents.

Nortel has inquired whether Microsoft expects to produce any documents that may appear to have originated with Nortel (e.g., customer pricing) but produced by other parties (such as customers, business partners and suppliers) to Microsoft in other proceedings. Without knowing if such is the case, Nortel would object to Microsoft's

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production in this action of any Nortel documents, as yet unreviewed by Nortel, which were previously produced by entities other than Nortel to Microsoft in the other proceedings.

Respectfully submitted,



Matthew W. Nayden

MWN/cks

Enclosure

cc: James B. Ulwick, Esquire, Counsel for Netscape Communications Corp.
Bruce Wecker, Esquire, Counsel for Burst.com, Inc.
James T. Southwick, Esquire, Counsel for Be Incorporated
John B. Isbister, Esquire, Counsel for Sun Microsystems, Inc.
Marc De Leeuw, Esquire, Counsel Microsoft Corporation
Dale A. Rice, Esquire, Counsel for Microsoft Corporation